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8 IN THE UNITED STATES BANKRUPTCY COURT  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
10 SAN JOSE DIVISION

11 In re:

12 INTEGRATED PACKAGING  
13 ASSEMBLY CORP.,

14 Debtor.

Case No. 07-53563-ASW

Chapter 7

Date: August 31, 2010

Time: 2:15 pm

Place: 280 So. First Street, Room 3020  
San Jose, CA

Judge: Hon. Arthur S. Weissbrodt

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17 **RESPONSE OF VICTOR A. BATINOVICH TO TRUSTEE'S MOTION**  
18 **FOR TURNOVER OF BANKRUPTCY ESTATE'S FINANCIAL RECORDS,**  
19 **INCLUDING ELECTRONIC RECORDS, CLIENT FILES BY ATTORNEYS**

20 Victor A. Batinovich ("Mr. Batinovich"), as responsible individual for Integrated Packaging  
21 Assembly Corp., the debtor herein ("Debtor"), hereby responds to the Trustee's Motion for Turnover  
22 of Bankruptcy Estate's Financial Records, Including Electronic Records, Client Files by Attorneys  
23 (the "Motion").

24 Mr. Batinovich does not oppose the relief requested in the Motion and intends to cooperate  
25 fully with the Trustee in her efforts to obtain the Debtor's financial records. Mr. Batinovich will turn  
26 over to the Trustee any of the Debtor's financial records in his possession, custody or control.

27 In the Motion, the Trustee states that she was "unsuccessful" in obtaining the turnover of the  
28 Debtor's records in November 2008. The statement is misleading because the Trustee never

1 requested the Debtor's financial records in November 2008 or at any time before filing the Motion on  
2 July 29, 2010, almost two years after conversion of the case to chapter 7. Nothing in the declaration  
3 of Reidun Stromshein filed in support of the Motion states that a turnover demand for such records  
4 was ever made. Rather, Ms. Stromshein's declaration simply states that she questioned Mr.  
5 Batinovich about the records at the November 2008 meeting of creditors and learned that he did not  
6 have them or know their whereabouts.

7 DATED: August 17, 2010

GOLDBERG, STINNETT, DAVIS & LINCHEY  
A Professional Corporation

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10 By: /s/ Dennis D. Davis  
Attorneys for Defendant Victor A. Batinovich

**CERTIFICATE OF SERVICE BY FIRST CLASS MAIL**

I, the undersigned, state that I am employed in the City and County of San Francisco, State of California, in the office of a member of the bar of this Court, at whose direction the service was made; that I am over the age of eighteen years and not a party to the within action; that my business address is 44 Montgomery Street, Suite 2900, San Francisco, California 94104-4789; that on the date set out below, I served a copy of the following:

**RESPONSE OF VICTOR A. BATINOVICH TO TRUSTEE'S MOTION  
FOR TURNOVER OF BANKRUPTCY ESTATE'S FINANCIAL RECORDS,  
INCLUDING ELECTRONIC RECORDS, CLIENT FILES BY ATTORNEYS**

on each party listed below by placing such a copy, enclosed in a sealed envelope with first class postage thereon affixed, in a United States Postal Service mailbox at San Francisco, California, addressed to each party listed below.

I declare under penalty of perjury that the foregoing is true and correct. Executed at San Francisco, California on August 17, 2010.

/s/ JEANNE ROSE

Reidun Stromsheim, Esq.  
Linda Sorensen, Esq.  
Stromsheim & Associates  
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D. Brad Jones  
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Integrated Packaging Assembly Corp.  
Attn: Victor A. Batinovich  
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Fremont, CA 94538

Nanette Dumas  
U.S. Trustee  
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San Jose, CA 95113

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